

[Submitting Counsel below]

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 23-md-03084-CRB

**ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
FILED UNDER SEAL**

This Document Relates to:

*Jaylynn Dean v. Uber Techs., Inc.*,  
N.D. Cal. No. 23-cv-06708  
D. Ariz. No. 25-cv-4276

Under Civil Local Rules 7-11 and 79-5(f), Plaintiff moves the Court to consider whether material designated confidential by Uber or third parties associated with Uber should be sealed.

On December 10, 2025, Plaintiff filed her Opposition to Defendants' Motion for Partial Summary Judgment which refers to and attaches documents that Uber or third parties associated with Uber designated "HIGHLY CONFIDENTIAL" and / or "CONFIDENTIAL."

**Material To Be Filed Under Seal**

The material to be filed under seal is portions of Plaintiff's Opposition and the attached exhibits. Documents indicated with a star are also addressed in Plaintiff's affirmative sealing motion are

Document	Description	Designating Party
[Unredacted] Plaintiff's Opposition to Defendants' Motion for Partial Summary Judgment	Portion of briefing referring to documents and testimony designated highly confidential and confidential	Uber Accurate Checkr
Exhibit 1	Elizabeth Ross 6/11/2025 and 6/12/2025 deposition transcript	Uber

Document	Description	Designating Party
Exhibit 2	Exhibit 3308-B to the 5/5/2025 deposition of Hannah Nilles	Uber
Exhibit 3	Exhibit 434 to the 3/27/2025 deposition of Gus Fuldner	Uber
Exhibit 4	Exhibit 2707 to the 4/10/2025 deposition of Andrew Hasbun	Uber
Exhibit 5	Exhibit 1110 to the 6/17/2025 deposition of Greg Brown	Uber
Exhibit 6	Exhibit 2005 to the 8/28/2025 deposition of Mariana Esteves	Uber
Exhibit 7	Mariana Esteves 8/28/2025 deposition transcript	Uber
Exhibit 9	Hannah Nilles 6/30/2025 deposition transcript	Uber
Exhibit 10	Exhibit 1052 to the 6/11/2025 deposition of Elizabeth Ross	Uber
Exhibit 11	Greg Brown 8/25/2025 and 8/26/2025 deposition transcript	Uber
Exhibit 12	Exhibit 1966B to the 8/26/2025 deposition of Greg Brown	Uber
Exhibit 13	Exhibit 1693 to the 7/15/2025 deposition of Greg Brown	Uber
Exhibit 14	Exhibit 1092 to the 6/17/2025 deposition of Greg Brown	Uber
Exhibit 15	Exhibit 2000 to the 8/25/2025 deposition of Mariana Esteves	Uber
Exhibit 16	Henry (Gus) Fuldner 3/26/2025 deposition transcript	Uber
Exhibit 17	Sunny Wong 6/25/2025 deposition transcript	Uber
Exhibit 18	Greg Brown 7/15/2025 deposition transcript	Uber
Exhibit 19	Greg Brown 7/16/2025 deposition transcript	Uber
Exhibit 20	Exhibit 2003 to the 8/25/2025 deposition of Mariana Esteves	Uber
Exhibit 22*	UBER MDL3084-BW-00027896	Uber
Exhibit 23	Exhibit 1884 to the 8/7/2025 deposition of Hannah Nilles	Uber
Exhibit 24	Exhibit 283 to the 3/13/2025 deposition of Tracey Breeden	Uber
Exhibit 25	Exhibit 613 to the 12/3/24 JCCP deposition of Kate Parker	Uber
Exhibit 28	Hannah Nilles 8/7/2025 deposition transcript	Uber
Exhibit 29	Exhibit 1239 to the 6/25/2025 deposition of Sunny Wong	Uber
Exhibit 30	Exhibit 2067A to the 10/14/2025 deposition of Sunny Wong	Uber
Exhibit 31	Sunny Wong 7/23/2025 deposition transcript	Uber
Exhibit 32	Exhibit 1240 to the 6/25/2025 deposition of Sunny Wong	Uber

Document	Description	Designating Party
Exhibit 33	Exhibit 1249 to the 6/25/2025 deposition of Sunny Wong	Uber
Exhibit 34	Exhibit 1248 to the 6/25/2025 deposition of Sunny Wong	Uber
Exhibit 35	Exhibit 3900 to the 5/20/2025 deposition of Michael Akamine	Uber
Exhibit 36	Hannah Nilles 7/23/2025 deposition transcript	Uber
Exhibit 37	Exhibit 636 to the 4/22/2025 deposition of Roger Kaiser	Uber
Exhibit 38	Exhibit 1062 to the 6/12/2025 deposition of Elizabeth Ross	Uber
Exhibit 39	Exhibit 1049 to the 6/11/2025 deposition of Elizabeth Ross al	Uber
Exhibit 40	Exhibit 1570 to the 7/11/2025 deposition of Todd Gaddis	Uber
Exhibit 41	Exhibit 1736 to the 3/14/2025 deposition of Greg Brown	Uber
Exhibit 42	Exhibit 1102 to the 6/17/2025 deposition of Greg Brown	Uber
Exhibit 43	Exhibit 1930 to the 8/25/2025 deposition of Greg Brown	Uber
Exhibit 44	UBER JCCP MDL 000108957	Uber
Exhibit 45	Exhibit 1104 to the 6/17/2025 deposition of Greg Brown	Uber
Exhibit 46	Exhibit 1101 to the 6/17/2025 deposition of Greg Brown	Uber
Exhibit 47	Exhibit 617 to the 12/3/2024 deposition of Kate Parker	Uber
Exhibit 48	Dara Khosrowshahi 7/1/2025 deposition transcript	Uber
Exhibit 49	Exhibit 1100 to the 6/17/2025 deposition of Greg Brown	Uber
Exhibit 50	Todd Gaddis 7/11/2025 deposition transcript	Uber
Exhibit 51	Greg Brown 6/17/2025 deposition transcript	Uber
Exhibit 52	Exhibit 1883 to the 8/7/2025 deposition of Hannah Nilles	Uber
Exhibit 53	Sunny Wong 10/14/2025 deposition transcript	Uber
Exhibit 54	Mariana Esteves 7/15/2025 deposition transcript	Uber
Exhibit 55	Exhibit 2071 to the 10/14/2025 deposition of Sunny Wong	Uber
Exhibit 56	Exhibit 2202 to the 3/26/2025 deposition of Gus Fuldner	Uber
Exhibit 57	Exhibit 1243 to the 6/25/25 deposition of Sunny Wong	Uber
Exhibit 58	Exhibit 645 to the 4/22/2025 deposition of Roger Kaiser	Uber
Exhibit 59	Rebecca Payne 5/13/2025 deposition transcript	Uber

Document	Description	Designating Party
Exhibit 60	Exhibit 2549 to the 4/3/2025 deposition of Rebecca Payne	Uber
Exhibit 61	Exhibit 1197 to the 6/17/2025 deposition of Jill Hazelbaker	Uber
Exhibit 63*	ACCURATE001	Accurate
Exhibit 64*	UBER-MDL3084-BW-00012056	Uber
Exhibit 65*	CHECKR000891	Checkr
Exhibit 66	UBER_JCCP_MDL_005696277	Uber
Exhibit 67*	CHECKR000894	Checkr
Exhibit 68	Hannah Nilles 8/7/2025 Wave I deposition transcript	Uber
Exhibit 69*	UBER-MDL3084-BW-00027874	Uber
Exhibit 70*	UBER-MDL3084-DFS00003621	Uber
Exhibit 72	Exhibit 1055 to the 6/11/2025 deposition of Elizabeth Ross	Uber
Exhibit 73	Expert report of Jason Morris	Uber

Under Local Rule 79-5(f)(3), the designating entities bear the responsibility to establish that all of the designated material is sealable.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Maya R. Kalonia in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: December 10, 2025

Respectfully submitted,

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*Co-Lead Counsel for Plaintiffs*

**FILER'S ATTESTATION**

I am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I attest that the signatories above concurred in this filing.

Dated: December 10, 2025

By: /s/ Andrew R. Kaufman  
Andrew R. Kaufman